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October 8, 2021

By ECF

Honorable Gabriel W. Gorenstein
United States Magistrate Judge
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007

MEMORANDUM ENDORSED

In Re: *New York City Policing During Summer 2020 Demonstrations*,
No. 20 Civ. 8924 (CM) (GWG)
This filing is related to all cases

Your Honor:

I am a Senior Counsel in the Office of Georgia M. Pestana, Corporation Counsel of the City of New York, and I am among counsel for the defense in the above-referenced matter. I write pursuant to Rule 1(E) of the Court's Individual Practices to respectfully request an extension of two weeks, from today, October 8, 2021 until October 22, 2021, for defendants to comply with the Court's Memorandum Order dated September 24, 2021 (Dkt no. 271). That Order directed defendants to provide the Court, no later than October 8, 2021, with certain materials relating to defendants' letter motion filed on August 16, 2021 (Dkt no. 232), seeking to quash portions of plaintiffs' subpoena to non-party Sean Smoot, a police practices expert retained by the team from the Office of the Corporation Counsel ("OCC") to assist with preparation of their report on the police response to the summer 2020 protests.

Plaintiffs take no position as to defendants' request for an extension of this deadline. This is defendants' first request for an extension of the October 8 deadline, and it does not affect any other scheduled dates in this litigation.

The Court's Memorandum Order dated September 24, 2021, directed defendants to provide to Court no later than October 8, 2021, "a sworn statement addressing the nature of the Smoot documents (including a statement of whether they involved purely factual material), and what role Smoot played in making recommendations to OCC," as well as "a copy of the documents...in electronic form for *in camera* review." (Dkt no. 271 at 6-7). Defendants require additional time in order to adequately prepare these items for submission to the Court.

Thank you for your consideration herein.

Respectfully submitted,

Jenny Weng /s

Jenny Weng
Senior Counsel
Special Federal Litigation Division

cc: ALL COUNSEL (via ECF only)

Application granted.

So Ordered.



GABRIEL W. CORENSTEIN
United States Magistrate Judge

October 12, 2021